

REMARKS/ARGUMENTS

Upon entry of the above amendment, claims 16-18, and 23 will have been canceled, and claims 12, 13, and 22 have been amended and submitted for reconsideration by the Examiner. Claims 14, 15, 19, 20, 21, and 24 also are pending and are submitted for reconsideration by the Examiner. In view of the above, Applicant respectfully requests reconsideration of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Advisory Action provided.

Turning to the merits of the action, the Examiner has rejected claims 12-24 under 35 U.S.C § 103(a) as being unpatentable by AKATSU et al (U.S. Patent 6,496,862) in view of LO et al. (U.S. Patent 6,324,178). Applicant respectfully traverses.

These claims are submitted to be patentable over the cited and applied references based on arguments and remarks set forth in the reply filed on March 3, 2004, which are incorporated herein by reference.

As noted above, Applicant has canceled claims 16-18, and 23 and has amended claims 12, 13, and 22. Thus, claims 12-15, 19-22, and 24 remain pending. Applicant respectfully traverses the above rejection based on these amended and pending claims and will discuss the outstanding rejection with respect to the amended and pending claims in the present application as will be set forth herein below. The amended claims merely

clarify the subject matter recited in the canceled claims, but do not narrow the scope of the claims.

Applicant's claims 12-15 relate to a gateway apparatus at a transmitting side of a system that receives data from a transmitting apparatus that does not have an IP address, configures the data for Internet transmission, generates an Internet-frame based on the data and an IP address which is assigned to a receiving apparatus. The IP address assigned to the receiving apparatus is input by an external input device. Claim 22 recites a related method.

On the contrary, AKATSU et al. discloses a managing node, as shown in Fig. 13 (col. 9, lines 2-19, col. 14, lines 11-67, col. 15, lines 1-52). The Examiner argues that this managing code of AKATSU et al. corresponds to the input device cited in the claims. However, the input device of the claims is an external device which is connected with the gateway apparatus and inputs the IP address assigned to the receiving apparatus. Applicant has amended the claims to make them more clear in this regard. On the other hand, the managing code of AKATSU et al. is a table, but not an external input device, as cited in the claims. Thus, AKATSU et al. do not disclose the external input device which is connected with the gateway apparatus and inputs the IP address assigned to the receiving apparatus, as the Examiner has admitted. Yet, additionally, and as admitted by the Examiner, AKATSU et al. does not relate to or disclose a transmitting apparatus that does not have an IP address.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, and 22 are not disclosed in AKATSU et al. recited by the Examiner.

LO et al. discloses a bridge circuit which transfers data between domains of differing data packet format. However, LO et al. merely transfers data between different domains. Thus, LO et al. do not disclose the external input device which is connected with the gateway apparatus and inputs the IP address assigned to the receiving apparatus. On the other hand, the claimed feature of the present invention includes how an apparatus not having an IP communicates with another apparatus via the Internet by utilizing IP address provided by an IP device. This feature of the claimed combination is not shown in LO et al. cited by the Examiner.

Further, LO et al. discloses that the domain can be any communication standard (col. 4, lines 52-55). However, this description relates to format of the data being transferred, but not to how a transmitting apparatus not having an IP address communicates with another apparatus via the Internet by utilizing IP address. Additionally, LO et al. also do not disclose input of an IP address by an external device, as recited in the pending claims. Thus, LO et al. also do not disclose the above features of the claimed invention.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, and 22 are not disclosed in LO et al. cited by the Examiner or by the combination of AKATSU et al. and LO et al.

In this regard, Applicant notes that LO et al. merely disclose conversion, not assigning of an IP address. The Examiner has submitted no evidence that such an IP address can be provided by the either of the cited references. Additionally, since the “input device” of AKATSU et al. is not disclosed as either “external” or inputting an IP address, there is no motivation provided by LO et al. to do so, at least since LO et al. do not input an IP address.

Applicant’s claims 19-21 also relate to a gateway apparatus at a receiving side of a system that receives an Internet-frame including an IP address corresponding to a receiving apparatus that does not have an IP address and data from the transmitting apparatus, searches the memory for the receiving apparatus not having the IP address to which the data is to be transferred, based on the IP address included in the Internet-frame, and transfers the data to the receiving apparatus not having the IP address. Further, the gateway apparatus has a memory which stores an IP address corresponding to the receiving apparatus not having the IP address and an application program. The application program converts received data into data which the receiving apparatus not having the IP address can interpret. The controller also converts the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address can not interpret. Claim 24 recites a related method.

On the contrary, the managing node AKATSU et al. also do not disclose a memory which stores not only an IP address corresponding to the receiving apparatus not having

the IP address, but also an application program which converts received data into data which the receiving apparatus not having the IP address can interpret, as shown in Fig. 13 of AKATSU et al. Thus, AKATSU et al. do not disclose a memory which stores an application program which converts received data into data which the receiving apparatus not having the IP address can interpret. Further, AKATSU et al. do not teach a controller which converts the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address can not interpret.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 19-21, and 24 are not disclosed in AKATSU et al. recited by the Examiner.

LO et al. merely transfers data between different domains, as explained above. Thus, LO et al. also do not disclose a memory which stores an application program which converts received data into data which the receiving apparatus not having the IP address can interpret. Further, LO et al. do not teach a controller which converts the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address can not interpret. This feature of the claimed combination is not shown in LO et al. cited by the Examiner.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 19-21, and 24 are not disclosed in LO et al. recited by the Examiner.

The combination of AKATSU et al. and LO et al. is also clearly distinct from the pending claims, since each of AKATSU et al. and LO et al. lacks at least the above features recited in Applicant's claims. Thus, the pending claims are submitted to be patentable over the Examiner's proposed combination. and are not obvious to one of ordinary skill in the art at the time the invention was made.

Specifically, Applicant notes that LO et al. merely discloses conversion, not assigning of an IP address. The Examiner has submitted no evidence that such an IP address can be provided by the either of the cited references. Additionally, since the "input device" of AKATSU et al. is not disclosed as either "external" or inputting an IP address, there is no motivation provided by LO et al. to do so, at least since LO et al. do not input an IP address.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejection and an indication of the allowability of all the claims pending in the present application in due course.

SUMMARY AND CONCLUSION

Applicant has made a sincere effort to place the present application in condition for allowance and believes that he has now done so. Applicant has canceled several rejected claims, has amended several rejected claims, and has submitted the claims for reconsideration by the Examiner. With respect to the pending claims, Applicant has pointed out the features thereof and has contrasted the features of the new claims with the disclosures of the references. Accordingly, Applicant has provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

P19529.A07

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
Kiyonori SEKIGUCHI

A handwritten signature in black ink, appearing to read "Bruce H. Bernstein", written over a horizontal line.

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